UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE)
COMMISSION,)
)
v.) Case No. 14-cv-11858-NMG
)
TELEXFREE, INC., ET AL.)
Defendants)

ASSENTED-TO MOTION FOR LIMITED RELIEF FROM "CONSENT ORDER AS TO DEFENDANT CARLOS WANZELER"

The Defendant, Carlos Wanzeler, through undersigned counsel, moves this Court for limited relief from the Consent Order as to Defendant Carlos Wanzeler (ECF No. 101) entered on May 9, 2014, to allow the ownership and control of the business entity known as Brazilian Help, Inc. to be transferred to Katia Wanzeler. In support of this motion, Mr. Wanzeler states as follows:

- On March 9, 2014, the Court entered the "Consent Order as to Defendant Carlos Wanzeler" (ECF No. 101), which among other things, had the effect of freezing the assets of Mr. Wanzeler.
- 2. On March 24, 2015, the Court entered an "Order Granting Limited Relief from Asset Freeze" (ECF No. 294), which released from the asset freeze the bank account at St. Mary's Credit Union, held in the name of Brazilian Help, Inc.
- Mr. Wanzeler is the sole owner of Brazilian Help., Inc. and has the sole signing authority for the bank account at St. Mary's Credit Union.
- 4. Mr. Wanzeler is unable to operate and manage the business of Brazilian Help, Inc. and maintain banking relationships with financial institutions, while the SEC case is pending against Mr. Wanzeler.

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Motion allowed. MM Gorton, USDJ 5/1/15